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Suite 300  
P.O. Drawer 200  
Winter Park, FL  
32790-0200

407-740-8575  
Fax: 407-740-0613

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: CC Docket No. 92-77

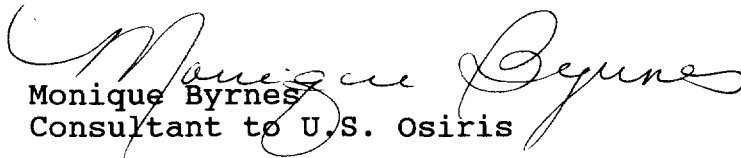
Dear Mr. Caton:

Enclosed for filing are the original and nine (9) copies of the Comments of U.S. Osiris Corporation for the Further Notice of Proposed Rulemaking in CC Docket No. 92-77.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for this purpose.

Questions regarding this filing may be directed to me at (407) 740-8575.

Yours truly,

  
Monique Byrnes  
Consultant to U.S. Osiris

cc: George Lebus, USOC  
FCC Contractor, ITS  
to file: USCO-FCC

No. of Copies rec'd  
List ABCDE

049

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
Billed Party Preference	)	CC Docket No. 92-77
for 0+ InterLATA Calls	)	

COMMENTS OF  
U.S. OSIRIS CORPORATION  
ON FURTHER NOTICE OF PROPOSED RULEMAKING

U.S. Osiris Corporation  
8828 Stemmons Freeway  
Dallas, TX 75247

Monique Byrnes  
Technologies Management, Inc.  
P.O. Drawer 200  
Winter Park, FL 32790  
(407) 740-8575

Consultant to  
U.S. Osiris Corporation

July 29, 1994

In the Matter of )  
Billed Party Preference ) CC Docket No. 92-77  
for 0+ InterLATA Calls )

U.S. Osiris Corporation, a privately held Texas-based company providing operator services, respectfully submits the following comments regarding Billed Party Preference on the Further Notice of Proposed Rulemaking in the captioned proceeding, released June 6, 1994.

USOC states emphatically and with statistical data as proof that less than 50% of all calls today are laced through the 0+ dialing method. The majority of calls are placed using an access code or

alternative dialing method. The unblocking measures, for both 10XXX and 1-800 calls, put into place through TOCSIA less than three and one-half year ago have proved extremely successful.

USOC provides data in these comments which clearly demonstrate the growth and acceptance of access code calling. USOC data has been collected through different methodologies. The different methodologies yield similar results, thereby supporting the findings as sound and accurate.

Furthermore, USOC demonstrates through data that the number of calls BPP will affect is today a small portion of the total number of calls placed, again due to the preponderance of use of access code dialing. By the time BPP can be fully implemented, currently a three year estimate, the number of calls affected will be much smaller than today's so as not to justify the direct implementation costs nor the resulting cost of abandoned equipment and technology investment.

Lastly, USOC invites the FCC to monitor calling patterns at USOC properties. Current data collection, which does not have to be done over an extraordinarily long time period for valid results, is the best approach to determining an accurate count/percentage of dial-around calls.

## **I. Changes in the Operator Services Industry**

Billed Party Preference (BPP) on the surface appears to be a totally consumer-oriented approach to voice telecommunications services. In a way, the issue has been presented so altruistically as to place those opposed to the effort on the defense.

In fact, BPP, when originally conceived, may have had some merit. Consumers were not aware of the then emerging operator services industry. Consumer confusion led to the adoption of state and federal regulations regarding posting, branding and operational requirements for operator service providers (OSPs). At the time BPP was originally discussed, consumers might have benefited through a sense of control over the transmission, and therefore indirectly over the rates, of operator assisted calls.

The operator services industry has changed significantly since those original discussions on BPP, and the changes have come from many sources. The operator service industry has undergone consolidations and mergers, thereby shrinking the number of providers, not unlike the telecommunications industry as a whole. Regulations have significantly modified behavior. Competition has increased substantially, and consumers have become better educated and more aware of technological changes as a whole, and changes in the telecommunications industry in particular.

Access code dialing (i.e. 10XXX) has become widespread. Changes in consumer calling patterns through an analysis of access code dialing is the best measurement of consumer education, awareness and acceptance.

10XXX dialing information has become standard in the promotional packages of most OSPs. This has become even more critical to all carriers with the advent of 10XXX intraLATA competition in many states.

However, 10XXX access code dialing is not the only form of dial around being utilized by consumers. Although not specifically mentioned in the Notice, the advent of 1-800 marketing campaigns, such as 1-800 COLLECT, 1-800-CALL-ATT and others, have introduced another significant dial-around dimension. These programs, backed heavily by print and television promotional dollars, have proved exceedingly successful.

Pacific Bell recently filed a tariff revision in California based on the significant increase of dial-around calling, citing the 1-800 campaigns in particular. In fact, Pacific Bell's tariff specifically states that the interexchange carrier non 0+ revenue-producing access calling programs including 1-800-CALL-AT&T and 1-800-COLLECT have significantly hurt their revenue stream. The tariff states a loss of revenue by not handling these calls on an intraLATA basis. The revenue number (which at \$2.9 million

annually refers to the lost \$.25 surcharge per call) translates to a total of 11.6 million intraLATA calls. A copy of the tariff filing can be found as Exhibit I.

Lastly, dial-around 1-800 calls are not limited just to the promotional programs mentioned above. Travel cards offered by most interexchange carriers are often accessed through 1-800 numbers. Business travelers are educated on how to use those calling cards especially as a way to manage company budgets. Additionally, the prepaid calling market uses 1-800 access to the computers used for card validation and debiting. The prepaid calling market is experiencing extraordinary growth, with projections of continued growth.

We can therefore break down 800 calls into two major categories: travel card/prepaid card/promotional programs (i.e. dial-around) and those 1-800 numbers which provide access to businesses and services, such as catalog companies or airlines. Although it is the belief of USOC that 1-800 dial-around calls are approximately 50% of all 1-800 calls, for the purposes of this discussion, USOC will utilize a conservative estimate. The data analysis included in these comments therefore assume that 30% of all 1-800 number calls are dial-around calls.

One benefit cited in the Notice is that BPP will refocus the OSP industry on the end user. Campaigns such as the one described above

are directly focused on the end user. Education by OSPs and all other telecommunications providers to increase awareness and use of 10XXX codes is focused directly on the end user. And they are working.

## **II. U.S. Osiris Background and Operations Overview**

U.S. Osiris offers operator assisted telecommunications service over resold facilities to entities providing telephone service to the public, such as hospitals and hotels. USOC provides operator assisted telecommunications services to approximately 1000 properties, including several hundred large hotel properties which utilize store and forward technology for call processing.

USOC provides its customers with micro-processor based equipment that provide both routing and screening of operator assisted calls to USOC, and route direct dialed calls or direct billed calls (through a proprietary calling card) to another carrier of choice.

Billing information is collected, stored and formatted by USOC and submitted to a third party clearinghouse for billing. Calls may be billed to a calling card, commercial credit card, the called number (collect) or a third party telephone number. Billing and collection of telephone calls is typically performed through local exchange companies, and USOC's name is on the end user bill except



where the local exchange companies lacks sub-carrier identification capability. USOC operations are typical of the industry and the data obtained is indicative of industry-wide calling patterns.

### **III. Dial-Around Data and Analysis**

Through the operational efforts described above, USOC has been able to collect historical and current information regarding the changes in consumer dialing patterns. USOC utilized several different data collection methodologies and obtained data from several different groups of properties in order to ensure data accuracy and allow the industry to extrapolate such conclusions into generalizations. Dial-around calls, excluding 1-800 calls, is 50-55%. Assuming that 30% of all 1-800 calls are dial-around, the percentages are increased by 10-15%.

The analysis has resulted in the same conclusions repeatedly: the true dial-around percentage, demonstrating significant consumer use and acceptance of alternate dialing patterns, is 60-70%.

1. Data polled from approximately sixty (60) specific hotel properties: January 1994 through May 1994

Utilizing data gathered through on-site equipment of Hotel Communications, Inc., USOC was able to extract the following data: total number of calls, number and percent carried by the company, number and percent dial-around and/or sent to AT&T. For the

period of time from January 1994 through May 1994 the percentage of dial-around calls and/or calls sent to AT&T was 58%.

The 58% figure does not include 1-800 calls. Such calls typically are routed over the property's 1+ trunks and do not reach USOC equipment. If we were to make assumptions regarding 1-800 call traffic the dial around number would increase the percent of dial-around to 73%.

2. Data polled from approximately one hundred and sixty (160) locations: January 1994 through June 1994.

Utilizing the same data gathering method as described above, USOC obtained similar call traffic data from an entirely different set of locations served by USOC. In this case, the percentage of dial-around calls using 10XXX or proprietary billing information 52%.

Once again, this percentage does not include any 1-800 call traffic. Adding 1-800 dial-around calls increases the total and true number of calls in which consumers are consciously utilizing the carrier of their choice is 67%.

3. Hotel call accounting reports from three properties.

For the period of one month, the call accounting records were used to quantify and categorize each call originating from three aggregator locations. All intraLATA, interLATA, interstate and

international calls were included. This methodology allowed USOC to determine the number of 1-800 calls more precisely. The total number of calls during the tracking month differed significantly for each of the hotels but the percentages in the table above demonstrate similarities in dialing patterns between the properties.

For the purposes of BPP, USOC grouped all calls into three categories: the number of 0+/all other operator assisted calls, the number of 1-800 calls and the number of 1+ calls. The 0+/other category includes "00" calls, calls using proprietary billing methods, as well as 10XXX. Of the total number of dial-around calls collected through the hotel call accounting systems, the percentage breakdowns between 1-800 and all others is as follows:

	<u>0+/other</u>	<u>1-800</u>
Location # 1	49.4%	50.5%
Location # 2	58.0%	42.0%
Location # 3	43.9%	56.1%

The ratio of operator handled/dial-around calls and 1-800 calls is approximately 1 to 1.

4. Call attempts per month from over 175 locations using store and forward technology.

In addition to the very valuable stand-alone data, USOC has collected trend data which demonstrates an increase in the percentage of dial-around calls. Quarterly statistics from second quarter 1992 through second quarter 1994 categorize calls dial-around as follows: calls placed through "00" to AT&T; 10XXX preferred carrier calls, calls placed using a proprietary calling card and calls re-directed to AT&T from USOC's operator center. The statistics indicate an increase from 43.4% to 51.9%.

Lastly, and in addition to the data discussed in sections 1 through 4 above, USOC reviewed data regarding the average number of USOC-billed per hotel room from January 1991 through April 1994. USOC tracked monthly the number of rooms on-line, the total number of calls, total number of minutes and average number of minutes per call and computed an average number of calls per room. Using January 1991 as a base, USOC handled 25% less calls on average in 1992 than it did in 1991 and 29% less calls in 1993 than it did in 1991. The number increases to 30% when comparing first quarter 1994 with the first quarters of 1991 and 1992. Although USOC can conclude from this data that the percentage of calls not being handled by the company are the result of an increase in 1-800/10XXX dial-around calls, the data is not detailed enough to rule out other variables which may have impacted and contributed to the

decrease. Although USOC asserts that the decrease in calls handled is due to an increase in the use of all manner of dial-around calling patterns, examining the average number of calls per room over time did not yield statistically conclusive results. From an anecdotal perspective however, the information is supportive and must be considered with some weight.

#### **IV. Data Conclusions and the Cost/Benefit Analysis of BPP**

Billed Party Preference will affect a far small percentage of callers than originally anticipated. Therefore it is critical to evaluate the implementation costs against the more accurate number of calls BPP will affect.

The local exchange companies have submitted cost estimates for implementing the appropriate routing and search technology at approximately \$1.1 billion in nonrecurring charges and \$60 million in annual recurring expenses - amortized to an annual cost of \$380 million. In addition, the Notice provided information regarding total OSP costs at approximately \$34 million per year. This adds up to an annual recurring cost of approximately \$420 million per year.

Assuming the above costs are correct, even though other analyses show differences increasing total non-recurring costs by fifty percent, and assuming a conservative percentage of dial around calls to be 55% we are left with the following conclusion. A \$1.1 billion investment in BPP technology for 60-70% of all operator

assisted calls changes to a \$1.1 billion investment for 20-30% of all calls. When annual recurring costs are factored in it becomes intuitively obvious that the investment is just not worth the perceived benefits.

#### **V. Additional data collection opportunity**

USOC respectfully invites the FCC to gather its own data on consumer calling patterns. The data is not difficult or costly to obtain and can be done under FCC guidelines and supervision. USOC believes that the operator services industry would willingly participate in such a data collection and analysis effort, and offers specifically to make its equipment available at any of its locations for the purpose of conducting an FCC data collection study. USOC will install equipment capable of tracking all 1-800 calls from a location and will research each and every 1-800 telephone number to determine which are actually access code (promotional campaigns and travel card/prepaid calling cards) calls. USOC makes this offer in an effort to allow the FCC itself to validate the results presented in these comments. The more accurate the data on dialing patterns, the more evident the conclusion that the use of access code dialing, and therefore the conscious choice of the majority of consumers to use the carrier of their choice, is widespread.

## **VI. Alternative Solution**

With the majority of consumers educated and making conscious choices regarding call transport, there not only is no need to implement BPP, there also is no need to implement stringent regulations across the entire operator services industry.

As complaints are made, the industry and the FCC should work together not just to resolve the individual complaints, but to understand and eliminate the root cause. All OSPs are not alike. And those differences cannot be addressed through across-the-board solutions above and beyond what is already in place. Trend complaints to determine the industry outlier, continue to encourage and perhaps even embark upon more widespread education of the consumer population.

OSPs large and small have found creative ways to entice consumers to dial more digits using the promise of lower rates as the lure. 1-800 campaigns, access to prepaid calling card databases through 1-800 numbers and other access methods have experienced tremendous growth over the last few years. The number of digits dialed is no longer a consumer issue.

Competition based on price and service has replaced any confusion and hassle previously associated with access codes and additional digit dialing.

Technology too is a differentiator between providers. Voice activated calling cards and other examples of innovative uses of technologies might not have occurred if BPP were in place and working. All OSPs do not operate nationwide. These two factors combined will require consumers of some OSP services to access those services through carrier access codes. Carriers will always compete on technology and a dialing plan will always be required.

Telecommunications providers can continue to offer creative and convenient solutions if allowed to operate in a market-driven environment. It is through these creative uses of technology that carriers in general and USOC in specific can state that the need for and use of carrier access codes will not go away as a result of BPP.

The replacement of 10XXX access codes with 101XXXX codes in 1995 will simply require additional education. The burden of this education will clearly fall on those carriers who wish to maintain and grow their customer base. As to the "burdens of access code dialing", so stated in the Notice, USOC has already stated clearly that the number of digits to be dialed is not a consumer hardship. Consumers clearly are using access codes, including 1-800 numbers, and the number of digits is not a deterrent.



## **VI. Improving the country's overall telecommunications infrastructure**

The telecommunications industry is so dynamic that often state and federal regulations cannot keep up with the changes. Such is the case with BPP. The investment in this country's overall telecommunications infrastructure will not suffer if BPP is not implemented. Technological advancements, the interest in the "information superhighway" and the continuing merging of technologies has taken on a life of its own.

In fact, BPP implementation may sidetrack efforts to provide new and innovative telecommunications services. The high cost of implementation will redirect resources that may be used to benefit telecommunications consumers in other ways.

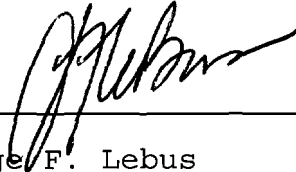
## **VII. Conclusion**

USOC has demonstrated, through data viewed from several different perspectives, that a more accurate percentage of dial-around telecommunications traffic is 60-70%. USOC has also demonstrated the significance of 1-800 access code dialing, which should be included in any dial-around analysis. When the majority of consumers are utilizing such dialing patterns, regulatory efforts and joint efforts between providers and regulators should focus in different areas.

Before any further action is taken, the FCC should and is invited by USOC to conduct its own traffic analysis studies, for which USOC offers its equipment and technical assistance.

U. S. Osiris Corporation respectfully submits these comments on  
Billed Party Preference.

July 29, 1994

A handwritten signature in black ink, appearing to read 'G. Lebus', is written over a horizontal line.

George F. Lebus

President

U. S. Osiris Corporation

8828 Stemmons Freeway, Suite 212

Dallas, Texas 75234

U.S. OSIRIS CORPORATION

EXHIBIT I

June 23, 1994

To: All California Public Utilities Commission Certificate of Public Convenience and Necessity Certificate Holders within Pacific Bell's California Serving Areas

From: Lori DeMatteis  
Public Communications Product Manager

Re: Pay Station Service Charge Advice Letter Filing  
Cal. Schedule P.U.C. No. 17014

This is to let you know that, on June 23, 1994, we filed the attached advice letter with the California Public Utilities Commission. Under the proposed tariff revision, the pay station service charge ("PSSC") which now applies to all intraLATA 0+ calls from pay telephones also will apply to all 950-XXXX, 1-800-XXX-XXXX, 1-700-XXX-XXXX, and 10XXX intraLATA non-sent paid carrier access calls that result in completion of an alternate billed intraLATA call. The PSSC will apply to all intraLATA alternate billed calls from all pay telephones (both ours and those placed by customer-owned pay telephone providers) within our service territory. We anticipate that the advice letter will be effective by August 2, 1994.

We are asking all interexchange carriers to bill and remit the PSSC charge of \$.25, less \$.02 expense allowance for your processing and handling, on a minimum monthly basis. We ask that you use the standard EMI format for these remittances. We will utilize our CARE database to provide you with current pay telephone numbers. (If this process does not fit with your business procedures, you may submit a monthly check to the Customer Owned Pay Telephone provider directly, as well as to the Local Exchange Carrier, as appropriate.)

We will be holding special carrier forums, one in Northern California and one in Southern California, to address any technical questions you may have concerning this filing. The first forum will be held on July 21, 1994 at the San Ramon Marriott Hotel from 9:30 to noon, in San Ramon California. The Marriott Hotel is located at 2600 Bishop Drive. The second forum will be held at the Anaheim Hilton and Towers Hotel on July 22, 1994 from 9:30 to noon in Anaheim, California. The Anaheim Hilton hotel is located at 777 Convention Way.

If you are interested in attending either session please **RSVP** by July 6, 1994 to Lori DeMatteis on 1-800-866-9131.

Sincerely,

  
Lori DeMatteis

Al Swan  
Executive Director  
Telephone

140 New Montgomery Street, Room 1718  
San Francisco, California 94105  
(415) 774-0373

**PACIFIC BELL**  
A Pacific Teleis Company

June 23, 1994

U 1,01 C  
Adv. Letter No. 17014

Public Utilities Commission of the State of California

We attach for filing the following changes in tariff sheets:

SCHEDULE CAL.P.U.C. NO. A6.

137th Revised Check Sheet A

13th " Sheet 11

Original " 11.1

This filing revises Schedule Cal.P.U.C. No. A6. Message Telecommunications Service, 6.2.1 Rates and Charges, to clarify the types of calls to which the \$.25 Pay Station Service Charge ("PSSC") applies.

Pacific Bell ("Pacific") presently bills the PSSC on all 0+ calls, as authorized by the Commission in D.90-06-018. This tariff revision specifies the types of revenue-producing calls to which the PSSC should apply.

In Decision 90-06-018 the Commission directed that the PSSC be revenue neutral. As a result, Pacific reduced certain operator service surcharges (i.e., the Calling Card surcharge, from \$.40 to \$.35 and the Collect surcharge, from \$1.00 to \$.95) in order to ensure revenue neutrality.

Since this tariff became effective, the interexchange carriers have introduced a variety of non-0+ revenue-producing carrier access calling programs including 1-800-Call AT&T, 1-800-Collect and 1-800-Operator. These new call types have significantly reduced those calls to which the PSSC applies under the literal wording of the tariff. The Commission had no way of anticipating the creation of these new call types at the time it issued D.90-06-018. However, it is clear from a reading of that decision that the Commission intended that the PSSC should apply to any revenue-producing 0+ or similar carrier access call where the carrier completes an intralATA carrier access call.

Pacific has lost approximately \$2.9 million in annual revenue to which it otherwise would have been entitled from application of the PSSC to these intralATA carrier access calls. The \$2.9 million refers only to PSSC revenue and not to operator service charges nor message toll rates. Our goal in modifying the tariff is simply to restore the requisite revenue neutrality.

PACIFIC BELL

2.

We are notifying end-user customers of the PSSC through current dial instruction cards. Those cards notify customers that the PSSC will apply to all 0- dialed intralATA calls.

In compliance with Section III. G. of General Order No. 96-A, we are mailing a copy of this advice letter and related tariff sheets to competing and adjacent Utilities and/or other Utilities, and interested parties, as requested. We are additionally mailing copies to those parties on record for Decision 90-06-018.

This filing will not increase any rate or charge, cause the withdrawal of service, nor conflict with other schedules or rules.

Anyone may protest this advice letter to the California Public Utilities Commission. The protest must set forth the specific grounds on which it is based, including such items as financial and service impact. A protest must be made in writing and received within 20 days of the date this advice letter was filed with the Commission. The address for mailing or delivering a protest to the Commission is:

Chief, CACD Telecommunications Branch  
505 Van Ness Avenue, Room 1203  
San Francisco, CA 94102

A copy must be mailed to the undersigned utility on the same date it is mailed or delivered to the Commission.

We would like this filing to become effective August 2, 1994.

Yours truly,

PACIFIC BELL



Executive Director

Attachments

Pacific Bell  
San Francisco, California

SCHEDULE CAL.P.U.C. NO. A6.  
137th Revised Check Sheet A  
Cancels 136th Revised Check Sheet A

NETWORK AND EXCHANGE SERVICES  
A6. MESSAGE TELECOMMUNICATIONS SERVICES

LIST OF EFFECTIVE SHEETS

Sheets listed below are effective as of the date shown on each sheet.

Revision Number	Sheet	Revision Number	Sheet	Revision Number	Sheet	Revision Number	Sheet
133.d	CS A	Original <sup>2</sup>	13.1	1st	39.1	22nd <sup>6</sup>	67
134.h <sup>4</sup>	CS A	5th	14	2nd	40	Original <sup>6</sup>	67.1
135.h <sup>5</sup>	CS A	1st	14.1	3rd	41	23rd <sup>6</sup>	68
136.h <sup>6</sup>	CS A	2nd	15	3rd	42	13th <sup>6</sup>	69
137.h <sup>1</sup>	CS A	2nd	16	3rd	43	17th <sup>6</sup>	70
48.h	CS B	2nd	17	3rd	44	2nd <sup>6</sup>	70.1
49.h <sup>5</sup>	CS B	2nd	18	3rd	45	8th <sup>6</sup>	71
50.h <sup>6</sup>	CS B	2nd	19	2nd	46	14th <sup>6</sup>	72
5.h	CS B.1	2nd	20	2nd	47	18th <sup>6</sup>	73
6.h <sup>5</sup>	CS B.1	2nd	21	2nd	48	4th <sup>6</sup>	73.1
7.h <sup>6</sup>	CS B.1	3rd	22	2nd	49	9th <sup>6</sup>	74
17.h	CS C	3rd	23	2nd	50	19th <sup>6</sup>	75
5.h	CS C.1	3rd	24	2nd	51	11th <sup>6</sup>	76
83.h	CS D	3rd	25	2nd	52	15th <sup>6</sup>	77
21.1	ToC A	1st	25.1	2nd	53	13th <sup>6</sup>	78
5.1	ToC B	2nd	26	2nd	54	21st <sup>6</sup>	79
41.1	1	3rd	27	13th <sup>6</sup>	55	4th <sup>6</sup>	79.1
21.1	1.1	2nd	28	21st <sup>6</sup>	56	Original <sup>6</sup>	79.2
21.1 <sup>4</sup>	1.2	4th	29	4th <sup>6</sup>	56.1	13th <sup>6</sup>	80
21.1	2	2nd	29.1	17th <sup>6</sup>	57	13th <sup>6</sup>	81
31.1	3	2nd	30	19th <sup>6</sup>	58	15th <sup>6</sup>	82
41.1	4	2nd	31	13th <sup>6</sup>	59	16th <sup>6</sup>	83
31.1	5	3rd	32	15th <sup>6</sup>	60	10th <sup>6</sup>	84
31.1	6	2nd	33	18th <sup>6</sup>	61	19th <sup>6</sup>	85
31.1	7	2nd	34	22nd <sup>6</sup>	62	16th <sup>6</sup>	86
41.1	8	2nd	35	19th <sup>6</sup>	63	13th <sup>6</sup>	87
51.1	9	3rd	36	2nd <sup>6</sup>	63.1	15th <sup>6</sup>	88
51.1	10	2nd	37	20th <sup>6</sup>	64	6th <sup>6</sup>	88.1
131.1 <sup>1</sup>	11	2nd	38	21st <sup>6</sup>	65	23rd <sup>6</sup>	89
Original <sup>1</sup>	11.1	3rd	39	18th <sup>6</sup>	66	3rd <sup>6</sup>	89.1
81.1	12						
51.1	13						

NOTE 1: Issued

NOTE 2: Advice Letter No. 16290 rejected October 6, 1992.

NOTE 3: Also known as Local Plus.

NOTE 4: Pending CPUC Approval of Advice Letter No. 16965.

NOTE 5: Pending CPUC Approval of Advice Letter No. 16982.

NOTE 6: Pending CPUC Approval of Advice Letter No. 16995.

(N)  
Continued



Pacific Bell  
San Francisco, California

SCHEDULE CAL. P.U.C. NO. A6.  
13th Revised Sheet 11  
Cancels 12th Revised Sheet 11

NETWORK AND EXCHANGE SERVICES  
A6. MESSAGE TELECOMMUNICATIONS SERVICE

(T)

6.2 STANDARD SERVICE OFFERINGS (Cont'd)

6.2.1 TWO POINT MESSAGE TELECOMMUNICATION SERVICE<sup>7</sup> (Cont'd)

(T)

A. GENERAL (Cont'd)

4. Rates and Charges (Cont'd)

1. Method of Applying Rates (Cont'd)

(12) Mileages and Corresponding Rates for Different Classes of Service

BASIC SCHEDULE

DAY RATE

Rate Mileage	Initial Period Station (Sent Paid)		
	Dial <sup>2</sup> 1-Minute	Coin <sup>1,3</sup> 3-Minutes	Each Additional Minute All Classes of Service
0- 8	\$ .17	\$ .30	\$ .07
9- 12	.17	.30	.07
13- 16	.20	.40	.10
17- 20	.22	.45	.13
21- 25	.25	.55	.16
26- 30	.28	.70	.19
31- 40	.31	.75	.22
41- 50	.34	.85	.25
51- 70	.37	.90	.28
Over 71	.40	1.00	.31

(T)

See Sheet 11.1 for all footnotes listed on this sheet.  
Material omitted now on Sheet 11.1.

(N)

Continued

Advisory Letter No. 17914  
Decision No.

Issued by  
A. E. Swan

Date Filed: June 23, 1994  
Effective:

Resolution No.